IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

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KEILEE FANT et al.,)	
)	
Plaintiffs,)	
)	
v.)	
)	Case No. 4:15-cv-253-AGF
THE CITY OF FERGUSON)	
)	(Class Action)
Defendant.)	
)	

UNOPPOSED MOTION FOR LEAVE TO FILE FIRST AMENDED COMPLAINT

On February 8, 2015, Plaintiffs filed this lawsuit against Defendant City of Ferguson. After this Court denied Defendant's Motion to Dismiss, the parties began discovery. The parties have made progress in discovery, although the amount of information and records is staggering. Discovery has so far included the exchange of electronic records and hard copy paper files covering more than 18,000 arrests and detentions over a five year period. The parties have been attempting and continue to work through various logistical difficulties pertaining to the ways in which the records have been stored. The parties have also been in regular contact to work toward negotiation of a settlement in this matter, and they are scheduled to participate in an all-day court-supervised mediation with Richard P. Sher on April 21, 2016.

The discovery conducted thus far, including examination of thousands of records and depositions of several current and former Ferguson employees and officials, has provided Plaintiffs with additional information concerning their claims and has created the need to supplement their complaint with additional claims based on information discovered concerning Defendant's post-arrest procedures.

Plaintiffs have consulted with Defendant, and Defendant does not oppose the filing of this Amended Complaint. Plaintiffs have also agreed with Defendant that Defendant need not respond again to all of the issues already contested and that Defendant can answer only those aspects of the complaint which are new.

Accordingly, Plaintiffs accompany this motion with a redlined version of the First Amended Complaint demonstrating those places in which changes to the original complaint have been made. *See* Exhibit 1.

Plaintiffs respectfully request leave to file the First Amended Complaint, which is also attached to this Motion. *See* Exhibit 2.

The parties have also agreed that, given the upcoming mediation, Defendant should have 30 days from the time of the filing of the First Amended Complaint to file a responsive pleading.

Respectfully submitted,

<u>/s/ Alec Karakatsanis</u>
Alec Karakatsanis (E.D.Mo. Bar No. 999294DC)

Equal Justice Under Law 916 G Street, NW Suite 701 Washington, DC 20001 (202)-681-2409 alec@equaljusticeunderlaw.org

<u>/s/ Thomas B. Harvey</u>
Thomas B. Harvey (MBE #61734)

<u>/s/ Michael-John Voss</u> Michael-John Voss (MBE #61742)

ArchCity Defenders 812 N. Collins Saint Louis, MO 63102 855-724-2489

<u>/s/ John J. Ammann</u>
John J. Ammann (MBE #34308)
/s/ Stephen Hanlon
Stephen Hanlon (MBE #19340)
_/s/ Brendan Roediger
Brendan Roediger (E.D.Mo. Bar No. IL6287213)

Saint Louis University School of Law 100 N. Tucker Blvd. Saint Louis, MO 63101-1930 314-977-2778

<u>/s/ Sonia W. Murphy</u>
Sonia W. Murphy (*Pro Hac Vice*)

White & Case LLP 701 13th Street, NW Washington, DC 20005 (202) 637-6161

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I certify that a copy of this Motion has, on April 12, 2016, been electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of the filing upon counsel for the Defendant in this matter:

Peter J. Dunne Robert T. Plunkert

PITZER SNODGRASS, P.C. 100 South Fourth Street, Suite 400 St. Louis, Missouri 63102-1821 (314) 421-5545 Counsel for Defendant – City of Ferguson

> /s/ Sonia W. Murphy Sonia W. Murphy

Attorney for the Plaintiffs